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QA 17637

October 27, 1993

Mr. James E. Scapellato
Director, Office of Motor Carrier Standards
U.S. Department of Transportation
400 Seventh Street, SW
Washington, DC 20590

FHWA-97-2176-24

Dear Mr. Scapellato:

I was present at a recent public meeting conducted by the Professional Truck Driver Institute of America (PTDIA) in Denver, Colorado to discuss PTDIA's draft triple trailer driver training curriculum. I serve as Secretary/Treasurer of PTDIA and fully support PTDIA's efforts in this area.

However, an FHWA representative at the same meeting mentioned that consideration was being given to including STAA doubles (twin 28-foot trailers combinations) under the LCV driver training mandate of FHWA Docket Number 92-10 ("Mandatory Minimum Training Requirements for Operators of Longer Combination Vehicles (LCVs)"). This, quite frankly, caught all of us at the meeting by surprise, given that the federal definition of LCVs in the ISTEA legislation specifically excludes STAA doubles, unless operated at weights greater than 80,000 pounds.

Yellow Freight System has already commented to FHWA Docket Number 92-10 and supported mandatory driver training for the operators of LCVs. In fact, as our comments to the Docket note, Yellow Freight has a thorough triples driver training program in place and was active in the development of the PTDIA triples driver training curriculum.

Yellow Freight opposes, however, making LCV driver training a prerequisite to holding or obtaining a "doubles/triples" endorsement on the Commercial Drivers License (CDL). Yellow Freight also opposes including STAA doubles themselves under the mandatory LCV driver training requirement. With triples currently authorized in only 16 states, Yellow Freight has drivers requiring the "doubles/triples" endorsement in 34 states, as well as many city drivers in the 16 triples states, who will never need training on triples. Yellow Freight has a pool of 15,939 road drivers, city drivers, mechanics and others needing a CDL "doubles/triples" endorsement to perform their work. We estimate the

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cost of training all these employees in the operation of triples at \$6,375,600. This is a very conservative estimate based on our existing in-house triples driver training program. Only a much smaller, targeted group actually operates triples, so only those drivers should be required to obtain the training.

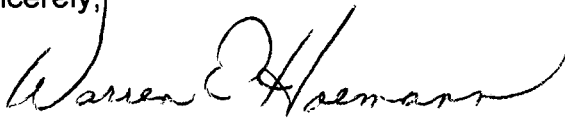
Similarly, including STAA doubles under the mandatory LCV driver training requirements would force us to meet some unknown training requirement for these 15,939 employees at a cost greatly in excess of our estimate for triples' driver training alone.

With millions of dollars in training costs at stake, we believe that Yellow Freight and other operators of STAA doubles (many of whom do not operate **LCVs**) deserve a more open approach to any discussion of doubles driver training. Even now, I doubt that Yellow Freight's sister subsidiaries, which **also** operate STAA doubles but do not operate **LCVs**, are even aware that a training requirement is being contemplated. Any consideration of an STAA doubles driver training requirement should be done in a manner that will have everyone's full attention and comments.

Yellow Freight is also concerned that contemplation of an STAA doubles driver training requirement under the LCV driver training docket will lead to confusion in the other areas of **ISTEA** mandates and studies on **LCVs**, including FHWA Docket 92-15 and the ongoing General Accounting Office study on LCV safety and economics.

For these reasons, Yellow Freight requests that STAA doubles not be included within the scope of FHWA Docket 92-10.

Sincerely,



Warren E. Hoemann

WEH: ldf

cc: FHWA Docket No. 92-10

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